

1 KAEMPFER CROWELL  
2 Peter C. Bernhard, No. 734  
3 Robert McCoy, No. 9121  
4 Ellsie E. Lucero, No. 15272  
5 1980 Festival Plaza Drive, Suite 650  
6 Las Vegas, Nevada 89135  
Telephone: (702) 792-7000  
Facsimile: (702) 796-7181  
Email: [pbernhard@kcnvlaw.com](mailto:pbernhard@kcnvlaw.com)  
Email: [rmccoy@kcnvlaw.com](mailto:rmccoy@kcnvlaw.com)  
Email: [elucero@kcnvlaw.com](mailto:elucero@kcnvlaw.com)

Attorneys for Plaintiff METEJEMEI, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

10 METEJEMEI, LLC, an Nevada limited  
liability company,

Case No. 2:21-cv-00249-JCM-VCF

**Plaintiff,**

vs.

13 MONEYTREE, INC., a Washington  
14 corporation; DOES I through X,  
15 inclusive; and ROE BUSINESS  
ENTITIES I through X, inclusive;

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

**(FIFTH REQUEST)**

Defendant(s).

18 Plaintiff METEJEMEI, LLC (“METEJEMEI”) and defendant  
19 Moneytree, Inc. (“Moneytree”) stipulate to extend the discovery deadline for an  
20 additional 30 days to complete the Rule 30(b)(6) depositions of the parties, pursuant  
21 to Fed. R. Civ. P. 26 as follows:

**22 | I. DISCOVERY COMPLETED**

23                   1. A Scheduling Order was issued by the Court on March 23, 2021  
24 under ECF No. 13.

1           2. METEJEMEI made its initial disclosures on April 1, 2021 and  
2 supplemented those disclosures on September 21, 2021.

3           3. Moneytree made its initial disclosures on March 22, 2021.

4           4. METEJEMEI propounded a first set of document requests to  
5 Moneytree on July 21, 2021, to which Moneytree responded on August 30, 2021.

6           5. METEJEMEI propounded a first set of interrogatories to  
7 Moneytree on July 28, 2021, to which Plaintiff responded on August 27, 2021.

8           6. Moneytree propounded a first set of document requests to  
9 METEJEMEI on July 30, 2021, to which METEJEMEI responded on September 7,  
10 2021.

11           7. Moneytree propounded a first set of interrogatories to  
12 METEJEMEI on July 30, 2021, to which METEJEMEI responded on September 7,  
13 2021.

14           8. METEJEMEI made its first supplemental disclosure on  
15 September 21, 2021 and second supplemental disclosure on November 30, 2021.

16           9. METEJEMEI began its deposition of Moneytree's 30(b)(6)  
17 representative on November 16, 2021.

18           10. Moneytree began its deposition of METEJEMEI's 30(b)(6)  
19 representative on January 10, 2022.

20 **II. DISCOVERY REMAINING**

21           1. Completion of deposition of the 30(b)(6) representative for  
22 METEJEMEI.

23           2. Completion of deposition of the 30(b)(6) representative for  
24 Moneytree.

1                   3. Moneytree's supplemental responses to METEJEMEI's  
 2 discovery requests in light of this Court's order granting METEJEMEI's motion to  
 3 compel.

4 **III. REASONS WHY DISCOVERY CANNOT BE COMPLETED**

5                   The parties have had difficulty completing the remaining two  
 6 depositions, including the Rule 30(b)(6) deposition of METEJEMEI. After the last  
 7 extension the Court granted, that deposition was set for January 10, 2022. Over the  
 8 weekend before that deposition, the parties' attorneys discovered an inadvertent  
 9 error that led to a mutual misunderstanding concerning the topics that were the  
 10 subject of that deposition notice, requiring the deposition be postponed.

11                  Although the parties have since amicably resolved that issue, the  
 12 attorneys' respective trial and hearing schedules have complicated rescheduling the  
 13 deposition. Specifically, METEJEMEI's counsel had two different trials in the  
 14 Eighth Judicial District Court—one this week and a second one scheduled for the  
 15 entirety of next week.

16 **IV. CURRENT DEADLINES AND PROPOSED NEW DEADLINES**

17                  Event	18                  Current Deadline	19                  Proposed Deadline
18                  Close of Discovery Deadline	January 28, 2022	<b>February 28, 2022</b>
19                  Dispositive Motion Deadline	February 28, 2022	<b>March 30, 2022</b>
20                  Pretrial Disclosures / Order	March 30, 2022	<b>April 29, 2022</b>

21 **V. OTHER**

22                  The parties agree that this discovery extension will be for the issues  
 23 identified in Section III above only and no new discovery requests will be served  
 24

1 absent compelling circumstances. To the extent additional discovery is needed, the  
2 parties will meet and confer.

3 KAEMPFER CROWELL

4 

5 Peter C. Bernhard, No. 734  
6 Robert McCoy, No. 9121  
7 Ellsie E. Lucero, No. 15272  
8 1980 Festival Plaza Drive, Suite 650  
9 Las Vegas, Nevada 89135

10 Attorneys for Plaintiff  
11 METEJEMEI, LLC

BALLARD SPAHR

12 /s/ Joel E. Tasca

13 Joel E. Tasca, No. 14124  
14 1980 Festival Plaza Drive, Suite 900  
15 Las Vegas, Nevada 89135

16 Attorney for Defendant  
17 Moneytree, Inc.

18 **ORDER**

19 IT IS SO ORDERED.

20 

21 UNITED STATES MAGISTRATE JUDGE

22 DATED: 1-24-2022